

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
DAVID SIDOO, *et al.*)
Defendants)
No. 19-CR-10080-NMG

JOINT STATUS REPORT AND REQUEST FOR ORAL ARGUMENT

Pursuant to the Court's Order of April 17, 2019 (ECF # 352), the Parties report that counsel for the defendants have conferred with the Government and have agreed to the Proposed Protective Order attached as Exhibit A.

Counsel for several of the defendants have requested that the Court include the provision below in the Protective Order. The Government has refused.

Proposed Additional Provision

FURTHER ORDERED that after 60 days following production of Discovery Materials by the Government, the requirements of this Order shall no longer apply to Primary Materials for each defendant, defined, with respect to each individual defendant, as any Discovery Materials that specifically reference or relate to that defendant or any of the defendant's family members, or that relate to any action taken by an alleged co-conspirator with respect to the defendant or any of the defendant's family members. If the Government believes that any Primary Materials for a particular defendant should remain subject to this Order, it shall so designate such materials and the "good cause" for such designation within 60 days of production, after which that defendant may challenge such designation at any time in a motion to the Court to modify the application of this Order. This provision only applies to Primary Materials for each defendant. As to all other defendants, the requirements of this Order remain in place for materials that are not Primary Materials as to them.

The parties respectfully request that the Court hear argument on the Proposed Additional Provision following arraignments on April 29th and then enter an order in the form of the Proposed Protective Order at Exhibit A with any modifications the Court feels appropriate following argument.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Eóin P. Beirne, hereby certify that on April 25, 2019, this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/Eóin P. Beirne